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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

SHANA GUDGEL, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

THE CLOROX COMPANY,  
  
Defendant.

Civil Case No. 4:20-cv-05712-~~KAW~~ PJH

**STIPULATION ENLARGING TIME TO  
RESPOND TO COMPLAINT;  
STIPULATED REQUEST TO ENLARGE  
TIME TO BRIEF FORTHCOMING  
MOTION TO DISMISS; ~~PROPOSED~~  
ORDER**

Pursuant to Civil L.R. 6-1(a), Defendant The Clorox Company (“Clorox”) and Plaintiff Shana Gudel (collectively, the “Parties”) respectfully submit the following Stipulation (Without Court Order) Enlarging Time to Respond to the Complaint.

Pursuant to Civil L.R. 6-1(b) and 6-2, the Parties also respectfully submit the following Stipulated Request to Enlarge Time to Brief Clorox’s Forthcoming Motion to Dismiss.

### **STIPULATION**

WHEREAS, on August 14, 2020, Plaintiff filed the initial complaint (Dkt. 1);

WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Clorox’s response to the initial complaint would be due by September 8, 2020 (*see* Dkt. 11);

WHEREAS, Clorox has informed Plaintiff that it intends to move to dismiss the initial complaint; and

WHEREAS, pursuant to Civil L.R. 6-1(a), which allows parties to stipulate in writing without court order to extend a defendant’s time within which to answer or otherwise respond to a complaint, the Parties have conferred and agree that Clorox shall file its motion to dismiss the initial complaint by October 8, 2020.

THEREFORE, the Parties, by and through their respective undersigned counsel, hereby stipulate and agree that Clorox shall have until October 8, 2020, to file its motion to dismiss the initial complaint.

### **STIPULATED REQUEST**

WHEREAS, the Parties agree that resolution of Clorox’s forthcoming motion to dismiss would benefit from extending the opposition deadline by two weeks and the reply deadline by one week;

WHEREAS, the Parties have stipulated and agreed that Clorox shall have until October 8, 2020, to move to dismiss the initial complaint;

WHEREAS, there have been no other time modifications in this case;

WHEREAS, no events or deadlines already fixed by Court order would be affected by the time

modification requested herein; and

WHEREAS, Clorox does not waive, and expressly reserves, all defenses.

THEREFORE, the Parties, by and through their respective undersigned counsel, hereby stipulate and agree to, and respectfully request that the Court order, the following deadlines:

- Plaintiff shall have until November 5, 2020, to file an opposition to Clorox's forthcoming motion to dismiss the initial complaint; and
- Clorox shall have until November 19, 2020, to file a reply in support of its forthcoming motion to dismiss the initial complaint.

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

DATED: September 15, 2020

By: Phyllis J. Hamilton

~~Hon. Kandis A. Westmore~~  
~~United States Magistrate Judge~~  
U.S. District Court Judge

DATED: September 3, 2020

Respectfully submitted,

/s/ Emily Johnson Henn

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5 /s/ Daniel Levinson

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*Attorneys for Plaintiff*

**FILER'S ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), Emily Johnson Henn hereby attests that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: September 3, 2020

By: /s/ Emily Johnson Henn